

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

COMSCORE, INC.,

Plaintiff,

v.

THE NIELSEN COMPANY (US), LLC
and NETRATINGS, LLC d/b/a
NIELSEN ONLINE,

Defendants.

Civil Case No. 1:11-CV-290 LMB-TRJ

**PLAINTIFF COMSCORE, INC.'S
MOTION FOR LEAVE TO AMEND ITS COMPLAINT**

Pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, Plaintiff comScore, Inc. (“comScore”) respectfully moves this Court for leave to amend its complaint. The proposed amended complaint, attached hereto as Exhibit 1, adds four additional counts alleging that defendants indirectly infringe United States Patent No. 7,260,837; directly infringe United States Patent No. 7,930,285; and both directly and indirectly infringe United States Patent No. 7,894,154. A proposed order granting the motion is attached hereto as Exhibit 2. The grounds for this motion are set forth in the accompanying memorandum of law. comScore provided Defendants The Nielsen Company (US), LLC and NetRatings, LLC (“Defendants”) with a copy of the proposed First Amended Complaint and sought their consent to this motion. As of the time of filing, Defendants have not yet informed comScore as to whether they consent.

Respectfully submitted,

Date: April 22, 2011

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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of April, 2011, I will electronically file the foregoing *Motion for Leave to Amend* with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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